

FILED

MAY 19 2022

B110 / 15 JF

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

KEVIN MYERS

Criminal No. 3:22-cr-12
(18 U.S.C §§ 2251(a), 2251(e), 2252(a)(1),
2252(a)(4)(B), 2252(b)(1), and 2252(b)(2))

[UNDER SEAL]

INDICTMENT

COUNT ONE

The grand jury charges:

From in and around December 2020, to in and around December 2021, in the Western District of Pennsylvania, and elsewhere, the defendant, KEVIN MYERS, attempted to and did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, as those terms are defined in Title 18, United States Code, Section 2256, knowing that such such visual depiction was transported in interstate commerce, to wit: from North Carolina to Pennsylvania.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWO

The grand jury further charges:

From in and around December 2020, to in and around December 2021, in the Western District of Pennsylvania and elsewhere, the defendant, KEVIN MYERS, knowingly transported and attempted to transport, any visual depiction using any means or facility of interstate or foreign commerce and in or affecting interstate or foreign commerce, by any means, to wit: from North Carolina to Pennsylvania, and the production of such visual depictions involved the use of a minor engaging in sexually explicit conduct and the visual depiction is of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(1) and 2252(b)(1).

COUNT THREE

The grand jury further charges:

From in and around December 2020, to in and around December 2021, in the Western District of Pennsylvania, the defendant, KEVIN MYERS, attempted to and did knowingly possess visual depictions, namely, individual computer graphic files, the production of which involved the use of minors engaging in sexually explicit conduct, as those terms are defined in Title 18, United States Code, Section 2256, which had been shipped and transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2252(a)(4)(B) and 2252(b)(2).

FORFEITURE ALLEGATIONS

1. The allegations contained in Counts One, Two, and Three of this Indictment are incorporated herein by reference as though fully set forth herein for the purpose of alleging criminal forfeiture pursuant to Title 18, United States Code, Section 2253(a)(3).


2. As a result of the commission of the violations charged in Counts One, Two, and Three of this Indictment, the defendant, KEVIN MYERS, did use the following to commit or to promote the commission of said violations:

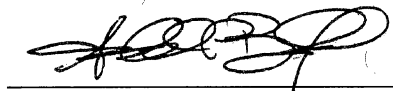
- a. One (1) Apple iPhone 12, bearing serial number DNRDP2Q80DXP.

WHEREFORE, the government seeks forfeiture of the subject property pursuant to Title 18, United States Code, Section 2253(a)(3).

A True Bill,


FOREPERSON


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